

Winston & Strawn LLP
101 California Street
San Francisco, CA 94111-5894

Douglas W. Hall (Admitted *Pro Hac Vice*)
Ford & Harrison LLP
1300 Nineteenth Street, N.W., Suite 700
Washington, DC 20036
Telephone: 202.719.2065
Facsimile: 202.719.2077
Email: dhall@fordharrison.com

Robert Spagat (SBN: 157388)
WINSTON & STRAWN LLP
101 California Street
San Francisco, CA 94111-5894
Telephone: 415-591-1000
Facsimile: 415-591-1400
Email: rspagat@winston.com

Attorneys for Defendant
SKYWEST AIRLINES, INC.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

SKYWEST PILOTS ALPA ORGANIZING
COMMITTEE, et al.,

Plaintiffs,

vs.

SKYWEST AIRLINES, INC.,

Defendant.

Case No. C-07-2688 CRB

**DECLARATION OF DOUGLAS HALL IN
SUPPORT OF DEFENDANT'S
OPPOSITION TO MOTION TO DISMISS
PLAINTIFF STEVE DOW**

Date: June 20, 2008

Time: 10:00 a.m.

Place: Courtroom 8, 19th Floor.

I, Douglas W. Hall, declare as follows:

1. I am counsel for Defendant SkyWest Airlines, Inc. ("SkyWest") in this matter, having been admitted to appear before the Court *pro hac vice*.

2. Captain Steve Dow is one of the named Plaintiffs in this matter. He submitted a declaration in support of the Plaintiffs' motion for a preliminary injunction in which he stated that he was one of the founders of the SkyWest Pilots ALPA Organizing Committee. Captain Dow also

Winston & Strawn LLP
101 California Street
San Francisco, CA 94111-5894

1 testified at the preliminary injunction hearing in this matter. He was the Plaintiffs' first – and
2 lengthiest – witness at that hearing.

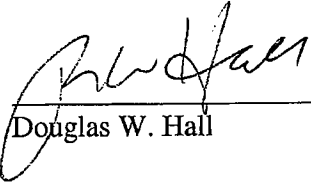
3 3. On February 21, 2008, SkyWest served interrogatories and document requests on the
4 Plaintiffs, including Captain Dow. Plaintiffs' responses, therefore, originally were due on March 24,
5 2008. On March 17, 2008, Linda Lye, one of Plaintiffs' counsel, asked me to extend until April 21,
6 2008 the deadline for the Plaintiffs' discovery responses. I agreed to her request.

7
8 4. At no time during my discussions with Ms. Lye concerning Plaintiffs' requested
9 extension to the deadline for submitting their discovery requests did she mention that Captain Dow
10 was leaving SkyWest's employment or that the Plaintiffs would seek to have him dismissed as a
11 Plaintiff as a result. If SkyWest had been aware of those facts, it would not have agreed to extend
12 the deadline for Captain Dow's discovery responses.

13
14 5. Because of the Plaintiffs' position that Captain Dow should be dismissed, Captain
15 Dow has yet to respond to the discovery requests propounded on him by SkyWest. In addition, to
16 date, Plaintiffs have taken the position that SkyWest should not be permitted to take the depositions
17 of any of the individual Plaintiffs who, like Captain Dow, testified at the preliminary injunction
18 hearing. As one of Plaintiffs' counsel put it in a letter to me dated May 14, 2008, they object to the
19 depositions of those Plaintiffs because they "have already been subject to lengthy cross-
20 examination."

21
22 I declare under penalty of perjury under the laws of the United States of America that the
23 foregoing is true and correct.

24 Executed this 30th day of May, 2008 in Washington, D.C.

25
26 
27 Douglas W. Hall
28